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ABSTRACT

Accountability has become an integral part of the accreditation process in higher education. The function has traditionally been performed by private agencies with the purpose of establishing common standards among colleges and universities. The function has recently expanded to include a concern for the welfare of society, and this has increased the necessity that the agencies that do the accreditation maintain their autonomy from the government and private interests. The justification and historical background for nongovernmental accrediting agencies is presented. Recent events have encouraged outside participation in accreditation, including unionization of professionals; the recognition of postsecondary education as a central issue in the political arena; the phenomena of "groupthink," in which members are much less sensitive to the public interest; and the realization of the inevitable conflicts of goals among educational institutions of different types and among various professions. Some alternatives confronting accreditation are presented, including increased governmental involvement and restructuring of accrediting agencies. The latter alternative is favored generally and the advantages and disadvantages of outside participation on accrediting committees is outlined as are some of the problems to be resolved in appointments of public members: resistance, definition, source, and quality. (JMF)

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ACCREDITATION and the PUBLIC INTEREST

William K. Selden

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The Council on Postsecondary Accreditation
One Dupont Circle, Suite 760
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Foreword

This is the second publication in what is hoped will be a continuing and significant series of *Occasional Papers* written for COPA by interested and knowledgeable persons involved in or close to accreditation in postsecondary education. The first of these papers issued nearly a year ago (about the "triad" in governance) was well received. Other authors were identified and encouraged to write on specific topics and the response has led to at least six additional papers either completed or being worked on. A snyposis of all the papers appears elsewhere in this publication.

William K. Selden is probably the most prolific writer on accreditation in the United States. As Executive Director of the National Commission on Accrediting from the mid-1950s to the mid-'60s, he often was outspoken for opening up the process to greater public scrutiny and public involvement. He predicted years ago that society was evolving toward a demand for greater accountability in its social systems, accreditation being one of them. Many within the accrediting community and within higher education at that time received Dr. Selden's writings and speeches with ill grace.

Now that accountability is a fact, not conjecture, however, Dr. Selden attempts in this paper to show that the placing of public members—appropriately identified and selected—into the mainstream of the accrediting process could make the process better and preserve its image in a changing society. Based on history, his ideas are worth considering.

Kenneth E. Young
June 1976

Accreditation and the Public Interest

William K. Selden

Who should control the regulating agencies?

Should officials of the radio and television industry be appointed to serve on the Federal Communications Commission? Should corporate executives and financiers be members of the Federal Trade Commission? Should representatives of labor unions serve on the National Labor Relations Board? Should mine operators fill positions on the Occupational Safety and Health Review Commission? Should members of the stock exchanges comprise a majority of the members of the Securities and Exchange Commission? Should the many state boards responsible for control of pollution of the environment include members whose business or professional responsibilities are related to chemicals, coal, iron, lumber and other enterprises that have by practice and tradition contaminated and defaced the ecology?

These related questions involve issues of political theory and practical politics. In a society with an autocratic form of government such questions would be answered with only one goal in mind. In our democratic society, which is based on the theories of separation and balance of powers and a federalistic form of civil government, answers may differ from each other depending on the era in which they are made and on the individuals to whom the questions are addressed. Under current conditions the answers will be markedly tempered by general awareness of possible conflicts of interest. We have recently been witness to many examples of conflicts of interest in both public and private life.

Viet Nam, Watergate, the Penn Central Railroad debacle, Equity Funding, the revelations of the Central Intelligence Agency and the Federal Bureau of Investigation are only a few of the causes of cynicism and current lack of public confidence in elected and appointed officials. Furthermore, the economic slump of the mid 1970's, dramatized by the severe financial retrenchment and political realignment forced upon the City and State of New York, place in bold relief the false promises of many of our political leaders for a future life of ease and comfort. Widespread doubt in the integrity and unbiased judgment of responsible officials is not limited, however, to those elected or appointed to public office.

In the minds of the general public there is doubt and questioning of the integrity and unselfish judgment of leaders in most all fields of activity, including business and labor, as well as education and the professions. And this doubt and questioning is intensified at a time when vocational and professional groups are being formed or being more closely solidified to represent and even insist upon attainment of larger economic and social benefits and spheres of activity for their respective members.

It is within this framework that accreditation and the public interest should be reviewed. Accreditation,[1] and the other major forms of credentialing—certification and licensure—have on occasions been employed to assure an economic, professional or social benefit for the separate groups controlling these activities. In the process of suggesting how the public may be better assured that accreditation, the subject of this essay, may not be diverted in the future from its primary commitment to the public welfare, it is appropriate to review briefly the development and purposes of both specialized and institutional accreditation.

I

Original Purposes of Accreditation

Accreditation has been defined as:

> the process by which an agency or organization evaluates and recognizes a program of study or an institution as meeting certain predetermined qualifications or standards. It shall apply only to institutions and their programs of study or their services.[2]

This form of control in higher education, which was initiated at the end of the previous century, did not become an influential factor in standard setting until after the issuance of the famous Flexner report on medical education in which the author pointed out that "the power to examine is the power to destroy."[3] From that period accreditation has developed into a controlling force conducted primarily by private agencies.

The field of medical education was the first to feel the impact of a nongovernmental program of standard setting. Within less than a decade the number of medical schools was reduced in half as shoddy, inept proprietary operations were forced to close. With financial backing from a foundation, and with the aid of publicity, the medical profession took giant strides to accomplish what many members of the American Medical Association and the Association of American Medical Colleges had through faltering steps been endeavoring to accomplish for some years. As a consequence, accreditation was established as an important and legitimate means by which a profession could raise the standards of education of its future members and at the same time exert further control over entrance into its ranks. This example was later followed by the legal profession and subsequently by scores of other professions.

Specialized Accreditation—Specialized or professional accreditation, such as in medicine or law, is concerned with the quality of education offered in programs of study, and is usually conducted by agencies or organizations that are national in membership and operation. The primary purpose for such accredita-

tion is to provide some assurance to the public of the quality of the education and training of future practitioners, a responsibility, as later noted, which has been considered to be one of the characteristics of a profession. Furthermore, this responsibility has been assumed to be both a privilege and a right of professions, a privilege and a right which they are reluctant to forego since the exercise of control over admission to the profession provides a means of professional enhancement and self-protection. As one means of assuring professional control, membership on boards and commissions responsible for specialized accreditation has until very recently been limited to members of the individual professions.

Institutional Accreditation—Institutional or regional accreditation takes as its purview an entire institution in an endeavor to maintain standards for the overall operations of the institution without identifying the quality of any one of its parts. Although there are exceptions, such type of accreditation has been conducted by associations of institutions based on a regional membership; and the committees responsible for the conduct of this activity invariably have been comprised of representatives of institutions already accredited.

The original purpose of institutional accreditation was to establish some common standards among colleges and universities in order to improve articulation between high schools and colleges, and to protect the presumed better institutions from those that were shoddy, weak, and improperly competitive.[4]

II

Present Functions of Accreditation

Since its early days—three-fourths of a century ago—postsecondary accreditation has acquired other functions that were not conceived when it was instituted in medicine in the late 19th century or by the North Central Association of Colleges and Secondary Schools which issued its first list of accredited institutions in 1913. The functions now identified have expanded the influence of the accrediting agencies in some cases beyond that which they have been willing to recognize. These functions include:

1. certifying that an institution has met established standards;
2. assisting prospective students in identifying acceptable institutions;
3. assisting institutions in determining the acceptability of transfer credit;
4. helping to identify institutions and programs for the investment of public and private funds;
5. protecting an institution against harmful internal and external pressures;
6. creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions;
7. involving the faculty and staff comprehensively in institutional evaluation and planning;
8. establishing criteria for professional certification, licensure,

and for upgrading courses offering such preparation; and

9. providing one basis for determining eligibility for federal assistance.[5]

In reviewing these functions it should be noted that most have a direct relationship and all have at least an indirect relationship to the public interest; that is, the welfare of society. This fact, especially in these times of widespread lack of confidence in officials functioning, leads immediately to the issue of the power of nongovernmental organizations to exert control over standards in postsecondary education when concurrent responsibilities and goals of these organizations may provide the basis for conflicts with self-interest.

III

Price Tag for Autonomy of Accreditation

In reviewing legislative and judicial developments at both the federal and state levels, William A. Kaplin, a legal authority on accreditation, has concluded that "due to the special competence of educational accrediting agencies. . . . autonomy is of paramount importance." In referring specifically to the law courts he continued:

> . . . the monopoly power of the agencies, coupled with the public function they fulfill, may make some supervision necessary. The extent of supervision, however, should be carefully limited.[6]

The thesis of this essay is that for innumerable reasons—cultural, economic, geographical, historical, political, social—our form of federalistic government with its separation of powers is best for the United States. This separation of powers includes not only the three branches of civil government, as well as the federal, state, and local governments, but also a balance between civil government and the private sector. Within this total governmental framework, accreditation of postsecondary education, when conducted by nongovernmental organizations, provides a constructive element in the balance of forces between the public and private sectors of our society.

With respect to the establishment and maintenance of standards in postsecondary education, the private accrediting agencies have generally provided, and should be encouraged to continue to provide in a relatively autonomous manner, a constructive governing force for the public welfare. The question is how to maintain this constructive force when the functions of accreditation have been expanded, when the accrediting agencies themselves are assuming more active roles in response to demands of their members for enhancement and protection of their self interests, and when these developments enlarge the potential for conflicts of interest. For nongovernmental accreditation to continue to be accepted and respected there actually must be *no* conflicts of interest and there must also *seem to be no* possibilities of such conflicts. The continued acceptance of nongovernmental accreditation has a price tag which, in a different context, has been identified by a middle western industrialist:

> Our price tag includes a new national attitude toward all kinds of government, public and private, a recognition that present-day institutions were designed for a simpler past and can

no more be expected to serve well tomorrow's complex and sophisticated needs than General Motors' initial organization chart would serve its 1980 business needs."[7]

IV

Nongovernmental Accrediting Agencies

If nongovernmental accreditation of postsecondary educational institutions and their programs of study is to be maintained—this essay proceeds on the assumption that for the sake of the public welfare it should be maintained—and if changes in the organizational structure of the agencies is one of the price tags for such continuation, it behooves us to review some of the analyses and observations that have been made of these organizations during recent years. Although there are obvious differences in the structure, policies, and operations between the agencies that accredit entire institutions and the ones that accredit specialized programs of study, it must be recognized that changes cannot be made in one type of agency without indirectly encouraging similar changes in the other.

Professional Associations—It has been stated quite accurately that "there is no such thing as the 'true' profession and no set of characteristics necessarily associated with the title. There are only those work groups which are commonly regarded as professionals and those which are not."[8]

Despite this admonition the traditional concept of a profession is based on the assumptions that there is an esoteric body of knowledge that only members of the profession can transmit, that only they are capable of judging who should be educated and admitted to practice the professions, and that they solely should establish the ethics by which their members should practice and on which they should judge and discipline fellow members. Based on this concept the professions have generally enumerated the following characteristics that they insist are necessary so they may maintain their autonomy and best serve the public interest (as well as, incidentally, the interests of their own members): (1) recruitment must be strictly controlled; (2) entrance must be strictly in the hands of the profession; (3) approval and accreditation must be done by the members of the profession; and (4) since recruitment, training and entrance into practice are all carefully controlled, any member of the professional group can be thought of as fully competent to supply the professional services.[9]

Elucidating these points more amply Eliot Friedson has written:

> Professional people have the special privilege of freedom from the control of outsiders. Their privilege is justified by three claims. First, the claim is that there is such an unusual degree of skill and knowledge involved in professional work that nonprofessionals are not equipped to evaluate or regulate it. Second, it is claimed that professionals are responsible—that they may be trusted to work conscientiously without supervision. Third, the claim is that the profession itself may be trusted to undertake the proper regulatory action on those rare occasions when an individual does not perform his work competently or ethically. The profession is the sole source of competence to recognize deviant performance and to regulate itself in general. Its autonomy is justified by its self-regulation.[10]

Robert K. Merton, the respected and oft-quoted sociologist, expands further on the basic obligations of a professional association and the contributions to public welfare that only it can make. He wrote:

> The foremost obligation of a professional association is to set rigorous standards for the profession and to help enforce them; standards for the quality of personnel to be recruited into the profession; standards for the training and education of the recruits; standards for professional practice; and standards for research designed to enlarge the knowledge on which the work of the profession rests. The association must be in the vanguard. The standards it sets must be more exacting than those with which the lay public might be content. After all, only the informed professionals can know the potentialities and not merely the current realities of professional practice. They are the custodians of the professional traditions of the past; through their constituted organizations, they must try to anticipate the future and continually raise their sights.[11]

In the performance of these functions the professions, as well as their individual members, must be free to further their professional aims and objectives, according to Robert G. Storey, a former president of the American Bar Association and, at one time, Chairman of its Section on Legal Education and Admissions to the Bar.[12] His philosophy of a profession would be identified today as elitist: Storey wrote:

> Unquestionably the movement to elevate the standards of business and of all callings is worthy of praise. However, the danger of this movement is that the old recognized professions may be pulled down to a common level of the newer ones. If professional ideals are given up and brought to a common level with the standards of the callings having the making of a livelihood as their primary purpose, then the members of the established professions and the new callings may all become employees rather than professional men.[13]

Granting that we continually require in society some elite individuals and organizations to set examples and a pace for the rest of us to aspire to and emulate, and granting that the three old and learned professions of medicine, law, and divinity have been the cynosure of all other striving professional groups, it must be recognized that economic, political, and social conditions are now changing in such manner and to such an extent that the traditional concepts of an autonomous profession are no longer tenable. Storey's comments belong in a different age.

Concurrent with claims for the social need for professional autonomy the literature has been replete in the past several decades with admonitions against too great professional power. These admonitions coincide with and undoubtedly have encouraged the *changing concepts of the professions.*

> Under the impact of metropolitan conditions, the concept of a profession has become transformed. No one speaks any more of the learned professions. Professional men were formerly regarded as possessing a broad culture, a wide special competence, and a general understanding of affairs. Consequently, they were influential members of society. A measure of leadership fell into their hands, and much that we value in our society was evolved under the influence of the older professions.
>
> Today, professional men are regarded by the public as experts—persons with high competence in a

> restricted sphere. Great deference is paid to them while they act within their particular range. Otherwise, they have little prestige. Outside their role, they are thought to have no more claim to be heard than the man in the street.[14]

As concepts of the professions have changed, so too has the increased number of vocations that aspire to professionalism, many of which do so with some justification. There is a natural desire for men and women to endeavor to improve their economic, their political, their social, and their vocational lot in life. In the present changing world fraught with competition, individuals increasingly tend to band together to strengthen their chances of attaining their aspirations. Establishing a professional society to assist in these endeavors is an approach that has gained momentum in the past several decades. The relative autonomy accorded by society to the professions is one of the incentives for this movement.

The publicly stated goal of every profession is "service to the public," and the claim is made that to assure competent service the profession must have the power to regulate the conduct and the qualifications of its members.[15] This power includes control over the education and training of its future members. In other words, "educational power includes determining the content and duration of training, monopolizing the auspices under which training takes place, selecting the trainees, and certifying the graduates."[16]

*Note: The recent Supreme Court decision in *Goldfarb vs. the Virginia State Bar* appears to challenge the assumption that the professions can engage in "monopolistic" activities, if such activities might affect the price of professional services.

Just as it is illogical to fault individuals for striving toward professionalism, it is shortsighted not to recognize the hazards for society in permitting professions to operate without adequate checks and balances. Corinne Lathrop Gilb has called attention to the fact that:

> clearly Montesquieu's doctrine of separation of powers, which had so much influence on American public government, has not significantly affected the government of American professional associations. The boards of directors operate in part like a legislative upper house, but they also function as the executive and the judicial branches of the association.[17]

Everett S. Hughes, a scholar sympathetic to the professions, has noted that they:

> seek more independence, more recognition, a higher place, a cleaner distinction between those in the profession and those outside, and a larger measure of autonomy in choosing colleagues and successors. One necessary validation of such changes of status in our society is introduction of study for the profession in question into the universities.
>
> This competition for status is accompanied by a trend toward prolonging the professional training at both ends: at the beginning by multiplying prerequisites for entry to professional school, at the finish by prolonging the course and the various apprentice or internship programs.[18]

The danger of professionalism, according to Garceau, lies in the concept that it is free from critical inquiry and beyond criticism except from its own members.[19] The pa-

thology of the situation is identified in the following observation:

> The worker does not see his work as merely different from others. He develops around it an ideology and, with the best of intentions, an imperialism that stresses the technical superiority of his work and his capacity to perform it. This imperialistic ideology is built into the perspective that his training and practice create. It cannot be overcome by ethical dedication to the public interest because it is sincerely believed in as the only proper way to serve the public interest. And it hardens when an occupation develops the autonomy of a profession and the place of dominance in a division of labor and when expertise becomes an institutional status rather than a capacity. The pathology arises when an outsider may no longer evaluate the work by the rules of logic and the knowledge available to all educated men and women and when the only legitimate spokesman on an issue relevant to all men must be someone who is officially certified.[20]

While Freidson writes in general terms, others identify specific deviations of professions from their publicly professed aims. Commenting on "those pillars of the professional society world . . . which most other societies seek to emulate," Herbert R. Northrup accuses the American Bar Association and the American Medical Association of having "engaged in practices not unlike those of some of the least responsible unions; e.g. race discrimination, restriction of entry into the calling, unfair competitive practices, and questionable political lobbying."[21] Pursuing further this analogy of the professions to labor unions and the market place, D. S. Lees recognizes that "restrictions on competition make life more comfortable for the producers."[22]

During this extended period in which concepts of the professions are undergoing revision, one of the most severe indictments of professional conduct has been made by a former commissioner of health for the city of New York, executive director of a large, metropolitan hospital, and dean of a school of medicine. Identifying conflicts of interest directly with accreditation, the late George James has written in an accusatory manner:

> Many professional organizations that are involved in standards of specialists or matters of accreditation are at the same time strongly committed to programs of self-protection. It is natural for them to defend themselves and their members, but the news releases of many professional groups are particularly replete with extensive battles for status and money.
>
> Conflict frequently arises between what are deemed to be the interests of the organizations and the interests of the public. One is easily led to a not-so-hypothetical question: If a very large medical organization spends millions of dollars fighting the medical programs the country needs and a majority of the people want without concern that this program insures a high quality of care, how long will the public continue to give such an organization sole control of the accreditation of institutions or the setting of standards for medical specialties? How can an organization's technical judgment be accepted on the one hand, when its judgment on planning to make better health care more available appears so inadequate?
>
> I think the questions are germane because what is done in matters of accreditation and the setting of standards has to flow out of some philosophy. The attainment of quality is inevitably influenced by the present views on medical care. The medical

care of the future will be influenced by the voluntary association's actions in accreditation and the types of standards which are established now.[23]

Regardless of the merits of these and other accusations of the monopolistic control of admissions and the educational and training programs for their future members, and irrespective of the defense that the professions may present for their activities, it is obvious that the concepts of the professions held by the public have been and are changing. Even though all workers have aspirations to be considered professionals, and even though there has been a surge in the creation of new professional societies, nevertheless professional persons are not held in such awe as they were a few generations ago. As technical contributions have increased in importance for the conduct of our society, more attention has been accorded to conflicts of interest that may arise when the professional organizations perform those functions—such as accreditation of educational programs and control of admission of members to their ranks—functions which had been considered in the past to be their privilege and right.

Regional Accrediting Associations—As stated earlier, there are differences between the agencies that accredit institutions and those that accredit programs of study. These differences do not negate the contention that the price tag for continued public acceptance, if not support, of accreditation by nongovernmental agencies applies to both types of accrediting organizations.

The regional accrediting associations of colleges and universities and the other agencies that accredit institutions are being subjected to criticisms for the manner in which they conduct their activities protected from public scrutiny. Similar criticisms were made with respect to colleges and universities in the 1910 report on *Medical Education in the United States and Canada.* In the foreword to that influential document Henry S. Pritchett, president of the Carnegie Foundation for the Advancement of Teaching, wrote:

> Educational institutions, particularly those which are connected with a college or university, are peculiarly sensitive to outside criticism, and particularly to any statement of the circumstances of their own conduct or equipment which seems to them unfavorable in comparison with that of other institutions. As a rule, the only knowledge which the public has concerning an institution of learning is derived from the statements given out by the institution itself, information which, even under the best of circumstances, is colored by local hopes, ambitions, and points of view. A considerable number of colleges and universities take the unfortunate position that they are private institutions and that the public is entitled to only such knowledge of their operations as they choose to communicate.
>
> The attitude of the Foundation is that all colleges and universities, whether supported by taxation or by private endowment, are in truth public service corporations, and that the public is entitled to know the facts concerning their administration and development, whether these facts pertain to the financial or the educational side.[24]

Could this statement be applied to the institutional accrediting agencies? Are they not in fact public service organizations? Have they fully conducted their activities in such manner as to indicate and demonstrate that their first and

foremost concerns are for the public interest?

In listening to some contemporary critics one must acknowledge that many of the officials of these associations apparently have been slow to appreciate their vulnerability to criticisms under current political and social conditions. In a speech to representatives of accrediting agencies in November 1970, James D. Koerner, a foundation executive, answered his own question of who benefits from accreditation, special interests or the public? He may have overstated the argument, but not entirely, when he accused the regional associations of exhibiting characteristics similar to many federal regulatory agencies in that they had acquired substantial power to regulate and in so doing tended to protect the status quo. The regional or institutional accrediting agencies, he said, "have become nothing but old-fashioned trade associations pipiously pretending to represent the public interest, when in fact they are coercive monopolies and operate behind a veil of secrecy."[25] Regardless of the fairness of this attack, these accusations do represent what many respected people think. They also highlight one striking characteristic that the professional societies and the institutional accrediting associations share in common.

Both professional societies and institutional accrediting associations have enjoyed considerable freedom of action and unusual autonomy in their operations. This they naturally wish to maintain, and they justify their desires on the special competence and superior judgment of their members in such matters. However, this characteristic is common to most groups. From his extensive studies and observations Robert M. MacIver noted:

> every group tends to cherish its own separate existence, is convinced of its own superior worth, regards its own ways as preferable to the ways of others, its own myths as exclusive deliverance from or high, and generally is suspicious, not infrequently contemptuous, of the outsider.[26]

V

Developments Encouraging Outside Participation in Accreditation

Fortunately in more recent years there appears to be less contempt, even less suspicion of the outsider on the part of members of accrediting agencies. This conversion, this acceptance, although sometimes reluctant, may be partially the result of changing concepts of professional societies, as well as response to public and governmental pressures. At the same time, there continues to be inadequate recognition of the reasons why competent outsiders should participate in the development of policies and in the conduct of accreditation by the professional societies and the institutional accrediting associations. Several developments are encouraging such participation.

Unionization—Professional people usually have been ambivalent about unionization. On the one hand, they considered themselves to be separate from and above labor unions; they insist that their main incentives are service to the public, a philosophical goal that is antithetical to slow-downs, strikes, or economic ultimatums. At the same time, we find, for example, that the teaching profession, no longer considers a strike to be anathema to its

practices and is supporting three competing but growing unions: American Association of University Professors, American Federation of Teachers, and National Education Association. In the health professions, not only have strikes been conducted by nurses, physicians, and other personnel, but unions by name are actually being formed to include interns, residents, and postdoctoral fellows. The Doctors' Association of the New York City Department of Health was founded for union purposes as long ago as 1961. In addition, organizations which consider themselves to be professional societies have been and are resorting to strikes and threats of strikes when their members believe that their economic, political, and professional rights are not being met.[27]

These regretful but inevitable developments in the health field are accompanied by growing public demand for more widely distributed health care, by expanding numbers of health professions, and millions of persons engaged in these professions and related vocations, and by an increased percent of the gross national product devoted to health-related expenses.[28]

In 1950, some 4.6 percent of the GNP was devoted to health; for 1975 approximately 8.0 percent was spent on health out of the total GNP which has increased in that 25-year span from $284 billion to $1.4 trillion. Also it was estimated that expenses for higher education in 1975 were some $35 billion.

Autonomy for the professions and postsecondary educational institutions, of which accreditation is an integral part, does not sit well with the public which is required to pay higher taxes, in part to meet the demands from the professions and postsecondary educational institutions for more funding from the public treasuries. Concurrent with these financial pressures the public is faced with sporadic work stoppages by employees of hospitals and educational institutions seeking economic and political personal benefits. These developments tend to separate the professions. The professions naturally strive to maintain their traditions of autonomy and primary commitment of service to the public. At the same time they are being forced by national and international economic, political, and social conditions to heed the expectations and demands of their individual members to provide them with protection from these conditions.

Political Arena—There can be no question that health care and postsecondary education are now central issues in the political arena. As these issues have become entwined in public policy, the national and state organizations representing the professions and higher education have reorganized so that they can be heard and make their presence felt on the public stage of civil politics.

On this stage they find themselves sometimes aligned but oftentimes in competition with each other in ever changing congeries of relationships. They are also in competition with other contending forces, one of which is represented by the aspirations of women and of minorities who, in their strivings for upward and lateral mobility, have found that accreditation and the other credentialing processes may impede their opportunities for such mobility. These minorities also note that the professions and the educational institutions largely have been in

control of these credentialing activities. As a consequence, through their growing utilization of political power, they have been able to add to the pressures of governmental insistence for changes in the structure and policies of accreditation.

Can these pressures be absorbed by society without drastically upsetting our political balance of forces? Can we continue to maintain a reasonable balance between the governmental and the private sectors of our society or, in order to provide adequate assurance that the public interest is being met in matters of accreditation, must we resort to increased activity on the part of government? The answer to these questions as they relate to accreditation depends to a large extent on the price that the professional societies and the institutional accrediting associations are willing to pay.

Groupthink—We have noted the possibilities for conflicts of interest in accreditation, and also the influence of minority interests through government on the agencies that accredit institutions and programs of study. There is a third factor that relates to participation of outsiders in the development of policies and the conduct of accreditation. This was adverted to by MacIver in his observation of group attitudes and has been expanded by Irving L. Janis, professor of psychology at Yale University, under his term of *groupthink*. Analyzing how intelligent men and women collectively could be involved in making decisions that subsequently proved to be so unfortunate for the nation, Janis identifies various factors that encouraged our government leaders during the past fifteen years to share and be so convinced of the value of their policies, and to do so with little dissent among themselves. These factors comprise:

1. an illusion of invulnerability;
2. collective efforts to rationalize;
3. unquestioned belief in the group's inherent morality;
4. stereotyped views of rivals and enemies;
5. direct pressure on any member who expresses strong arguments against any of the group's stereotypes, illusions, or comitments;
6. self-censorship of deviations from the apparent group consensus;
7. shared illusion of unanimity concerning judgments conforming to the majority view; and
8. emergence of self-appointed mind-guards—members who protect the group from adverse information that might shatter their shared complacency about the effectiveness and morality of their decisions.[29]

The analogy between the collective leaders of the Federal government and agencies that accredit institutions and programs of study is not exact. Just the same, there is considerable groupthinking on the part of members of any organization, and this pattern of similarity of thought does influence the members of any ingroup, including those who are responsible for accrediting activities. Power politics is not limited to international relations; it also can be noted in and among organizations that are concerned with institutional or professional

jurisdictions. When organizations are involved in forms of power politics, their members are prone to adopt the characteristics of groupthink, in which condition they are likely to be much less sensitive to the public interest; but public interest should be the main focus of accreditation.

Conflicts in Goals—It is inevitable that there will be conflicts of interest and goals among educational institutions of different types, and among various professions whose fields of service overlap. Historically we have seen this in the delayed acknowledgment by the institutional accrediting agencies of the need to recognize and accredit first the teachers colleges, then the junior colleges, and lately the proprietary institutions. More recently we have witnessed such conflicts in accreditation as those between pathologists and medical technologists, lawyers and legal assistants, physicians and allied health personnel, as well as conflicts within such professions as laboratory personnel and nursing.

These conflicts derive in part from advancement of professional knowledge and technical expertise, and from pressures for expansion of jurisdictions. The result is strain and stress in relationships among professions that should be working cooperatively for the welfare of the public. In attempting to gain support for their goals, each professional society seeks support from the executive, judicial, and legislative branches of government at both the federal and state levels. By thus proceeding, the organizations, whether associations of postsecondary institutions or professional societies, encourage the involvement of government in decision making where the organizations claim autonomy. This involvement, of course, includes accreditation.

Even though many members of the professions may independently develop congenial working relationships across professional (one might even say party) lines, "it is common sociological observation that when rival claims issue in conflict, each side is likely to develop stereotypes and misconceptions of the other, especially in formal contexts,"[30] and unconsciously adopt the characteristics of groupthink.

"This problem only underscores the importance of instituting and maintaining effective liaison between professions, for only if this is firmly established can the relationships bear the stresses which initially conflicting claims to jurisdiction imposes upon it."[31]

Conflicts in goals between organizations representing different types of educational institutions or those representing different professional groups can be resolved in one of two ways; either the organizations themselves can cooperatively find the means to resolve many of these conflicts, or increasingly governmental involvement and intervention can be expected. The use of outside or public members on boards and committees responsible for accreditation is one of the means by which agencies can cooperatively endeavor to resolve some of their conflicts in goals.

VI

Alternatives Confronting Accreditation

A number of studies have been made of accreditation in attempts to evaluate its usefulness, to find ways to simplify its operations, to

identify alternative methods of accomplishing its purposes, and to verify its effectiveness in meeting the needs of educational institutions, the professions, and society. Most of these studies—intentionally or otherwise—seem to conclude that accreditation contains the genes of a hydraheaded monster and appears to grow out of control, presenting an unsolvable conundrum. This frustrating conclusion need not be repeated so often, however.

If one accepts the premises that accreditation is part of the total fabric of the governing process of our society, and that there are really only two alternatives for the future of this form of educational control, then accreditation is not necessarily an unmanageable operation. Although there may be innumerable variations, the two primary alternatives are (1) either markedly increased governmental involvement in the total process, or (2) further reliance on the balance of powers between the governmental and private sectors of our society.

Increased Governmental Involvement—It is neither morally wrong, nor need it be legally improper, for government to be directly active in the accreditation of postsecondary institutions and/or their programs of study. In fact, it will become necessary for government to increase its involvement in order to provide assurance to the public that accreditation is being conducted primarily for the benefit of society, including all its various elements. More governmental involvement will be necessary, that is, unless all of the accrediting agencies voluntarily adopt measures which provide adequate assurance to the public that the agencies are not subject to conflicts of interest, that they are aware of the concerns of minority groups, and that they are conducting accreditation primarily for the public welfare and only incidentally for the benefit and protection of the institutions and the professions.

Restructuring of Accrediting Agencies—The author has already declared his preference for a minimum of governmental involvement in accreditation, providing, however, that the accrediting agencies are both meeting and appearing to meet adequately the needs of society. This preference is based on the philosophy that the form of governmental control in which there are balances of powers has proved to be best for this country; and one of the important balance of powers rests between the government and the private sectors. To maintain such a balance of forces in postsecondary education it is appropriate that accrediting activities be conducted by nongovernmental agencies. However, to fulfill their responsibilities these agencies must be structured and operated in a manner more reoriented to the needs of society.

The current needs of society would indicate that all accrediting agencies should now incorporate, if they have not already done so, such characteristics as the following:

1. The boards or committees responsible for accreditation should be semi-autonomous in structure and empowered to make final decisions, subject only to the right of appeal, with respect to the accredited status of institutions or their programs of study.

2. Only statements of policy and operating budgets of accrediting agencies should be sub-

ject to review and approval or revision by the organizations which sponsor accrediting agencies. All other types of documents submitted by the accrediting agencies to their sponsoring organizations should be for informational purposes only.

3. All statements of policy requirements and standards for accreditation should be publicly developed, tested for their validity before being implemented, and periodically and publicly reviewed.

4. Accrediting agencies should conduct their reviews of institutions and programs of study in such manner that there is opportunity for public involvement at appropriate times in the process.

5. Outside or public members should be included on all boards and committees responsible for accreditation of post-secondary institutions and/or programs of study.

6. All members, including outside or public members, of boards or committees responsible for accreditation should be limited in their terms of appointment in order to assure gradual rotation of membership.

The purpose of such provisions is both to assure that the accrediting agencies are continually and fully aware of the public interest, and at the same time to reduce to a minimum the possibilities of conflicts of interest between the public welfare and the economic, political, professional, or social goals of the individual or institutional members of the organizations.

Since this essay is concerned more specifically with only one of those characteristics—the involvement of outside members on boards of committees responsible for accreditation—it will be concluded with more specific reference to factors relating to this single issue.

VII

Outside Participation on Accrediting Committees

The proposal for a broad revision in the composition of accrediting boards and committees, as well as licensure boards, has been made in the past,[32] but its implementation has been slow.[33] The slow acceptance of public or outside members on accrediting committees can be attributed partially to natural resistance to a new concept, and partially to real difficulties in the involvement of public members.

Disadvantages—There are definite and identifiable difficulties that should be recognized. These include the following:

1. The most frequently expressed criticism is that outside or public members on accrediting committees have insufficient knowledge to be productive members. Because of this lack of knowledge they may delay the proceedings by raising elementary questions and disrupt what would otherwise be a cohesive group in its discussions and deliberations. The issues in accrediting, it is asserted, are technical in nature and therefore require the expertise of technically competent persons.

2. An opposing viewpoint of some persons is that outside members may be deficient in their ability or willingness to question and too willing to accept the verdict of the other members. Such an approach provides the public with a false sense of reliance on the judgment of outside members.
3. Costs have always been a difficult problem for accrediting agencies. Increasing committee memberships with attendant travel costs adds a further burden with no corresponding source of additional funds.
4. There is no accepted method by which outside or public members may be appointed. Every method that has been proposed has its disadvantages.

Advantages—Despite these and other difficulties, which should not be dismissed as unimportant, there are corresponding advantages that provide constructive support for the arguments in favor of inclusion and participation of outside members on boards and committees responsible for accredition.

1. Outside members are more likely to raise questions which might otherwise be overlooked, and in so doing these members will tend to enlarge the perceptions of all members as to the implications of committee actions. In this manner, outside members are in a position to counteract the tendencies of groupthink among members representing only institutional or individual professional points of view, and to stress wider public interest and social responsibilities.
2. Outside members also can serve as a symbol to the public that its broad interests are being represented when issues which impinge on public policies are being decided.
3. Outside members can speak publicly to some issues and on occasions carry more credence than members who represent institutions or professional fields of study subject to accreditation.
4. Outside members can serve as stimulants to accrediting bodies that are subject to similar paralysis of maturity and old age that has been diagnosed among federal regulating agencies.[34] Senility in an accrediting agency can exert a widespread stultifying force that society cannot afford, and continual efforts should be made to prevent such contamination.

Despite these potential advantages for the inclusion and participation of outside members on boards and committees responsible for accreditation, the advantages remain only potential unless the individuals appointed are able to fulfill their responsibilities with intelligence and wisdom. In other words, the contributions of these outside members depends to a very large extent on the quality of the individuals selected and appointed. To assure successful implementation of the policy of appointing outside members some problems must be resolved.

Problems to be Resolved—There are at least four problems to be resolved in appointments of public members, (1) resistance, (2) defini-

tion, (3) source, and (4) quality. There is always *resistance* to a new idea, especially to one that appears to weaken the position of those whose support for the concept is necessary. However, pressures are increasing for inclusion of outsiders on many boards and committees in various types of activities. Employee participation on boards of management in business and industry has been an issue of long standing. More recently consumer advocates increasingly have been persistent and have made considerable headway on boards concerned with the the delivery of health care. Their presence has already been felt. John H. Knowles, currently president of the Rockefeller Foundation, previously noted:

> The consumer is approaching a position of greater effectiveness and influence in medical policy. He will probably change the balance of power. If policy continues to be set in conflict, more of the decisions are likely to fall to the consumer.[35]

Again commenting on the need for cooperation with the participation of outside members (consumers), the National Advisory Committee on Health Manpower stated:

> The scope of health issues has grown to the point that most of the major debates now involve questions closer to public policy than to the specialized competence of the health professional. The solution lies in building a creative partnership between consumers and providers rather than establishing the supremacy of either.[36]

With statements such as these being frequently bruited, and with business and industry, government committees and private agencies all consciously including outside members on their boards, acceptance of the concept is expanding. Despite these developments it must be conceded that:

> In all . . . organizational transformations there is revision in structure and process, always painful to achieve because of human fear, uncertainty, and strivings to protect what individuals grow to consider their vested interests. Vested rights become solidified into codes of ethics, and codes of ethics become sacrosanct. To change them is often considered to be an act of sacrilege.[37]

We now are discovering that professional codes of ethics are no longer sacrosanct when the courts determine that their pursuance results in restraint of trade.[38] This more recent development will accelerate further erosion of opposition to outside members on boards and committees responsible for accreditation, and will stimulate wider recognition of the advantages to be gained from their inclusion and participation.

The question of who should qualify as a public or outside member can be made a sticky wicket by those who insist on a specific, detailed, all-inclusive *definition.* It is quite possible that no definition could cover all potential individuals. An attempt to develop such a definition would likely entail consideration of issues of great minutiae. For the present a broad definition would seem appropriate to convey the spirit of intent:

> A public or outside member, serving on a board or committee responsible for accreditation, is a person who has no involvement with institutions or programs of study subject to accreditation by the agency on whose board or committee he or she serves, and whose service on such board or committee is or can be subject in no way

to current or potential conflicts of interest or of loyalties.

This definition is intended not to exclude individuals from associated professions, only from the same profession, from serving among the public or outside members on a board or committee. In fact, inclusion of associated professionals is to be encouraged as one means of mitigating the strains that exist among and between some of the professions. As has been noted earlier, the longer that issues among professions remain unresolved the greater is the necessity for government to be involved in resolving the conflicts.

The theme of this essay is that we should endeavor to maintain a proper balance of powers in our total governmental structure, including a balance, however constantly changing, between the public and private sectors of our society. To maintain this balance the elements in the private sector must be prepared to adjust and revise in such manner that they can resolve many issues among themselves and do so with constant and primary attention to the public welfare. Public members on accrediting boards and committees are one factor in the maintenance of this proper balance of powers.

The definition advanced of a public member need not be limited to the membership of committees responsible for the conduct of accreditation. It could apply as well to the composition of the United States Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility, the Council on Postsecondary Accreditation, and other agencies. The definition has equal applicability to state licensure boards and nongovernmental bodies responsible for the certification of professional personnel.

In all cases the question is likely to arise whether a member of a board of trustees of a college or university should be considered a public member if the trustee's institution is subject to review by the accrediting committee. Some will argue that such trustee experience enhances the competence of an individual to serve as a public member, especially when it is assumed that the number of persons capable of making a constructive contribution in a somewhat technical area is limited. The advocates of this position hold to the point that trustees may absent themselves from meetings when that person's college or university is being considered by the committee, thereby removing any possibilities of conflicts of interest.

Such an approach begs the issue of both avoiding and seeming to avoid any current or potential conflicts of interests or loyalties. Rephrasing the questions with which this essay was begun we might ask, should members of boards of directors of the radio and television companies be permitted to serve on the Federal Communications Commission, subject only to their excusing themselves from attendance at meetings when issues relating directly to their companies were being considered? Should members of boards of labor unions be appointed to the National Labor Relations Board with similar provisions? Such a practice would not be countenanced in these or any other government agencies. Therefore, why should such a practice be followed with respect to the ap-

pointment of truly public members to boards and committees responsible for accreditation?

The fields of education and the numerous professions should adopt every measure to maintain their position of advocacy for the public welfare and retain both actual and apparent integrity of operation. No compromise in this position should be encouraged.

It is difficult to identify public members of the caliber required for appointment to such positions. Nevertheless, the population of the United States is large and diverse, and we are blessed with innumerable individuals of intelligence, energy, and a commitment to the betterment of society who would be willing to serve as public members if requested to do so. One of the elements required in identifying such persons is an organization charged with the responsibility of maintaining a roster of potentially competent individuals.

A third vexatious problem is the question of who should actually serve as the *appointing agency* for outside or public members on boards or committees concerned with accreditation. There is no single answer. As a result, there are different methods that may be employed, and they may be either inside or outside sources.

If appointment of public members is to be made by *inside sources* there are various ways to do this. The normal appointing procedures of the sponsoring organization may be used, e.g., the president may appoint the public members. Nominations might be solicited from outside sources. Also, the board or committee responsible for accreditation may itself be empowered to appoint public members. Or the several sponsoring organizations for the accrediting agency might form a joint special committee for this single purpose of appointment.

If *outside sources* of appointment are employed, and this method would seem to offer many advantages and benefits, the appointing organizations must be identified and agree to assume this responsibility. The practical possibilities are not numerous but include such nongovernmental associations as the American Council on Education and the National Health Council, each of which has a membership of organizations and neither of which is directly involved in accreditation in any manner, although both have a history of considerable concern for and interest in this activity.

From time to time, suggestions are made that appointment of outside members should be made by the Secretary of Health, Education, and Welfare. It should be observed that appointments from this source partially negates the principle of proper separation and balance of powers and should be employed only if other methods fail of acceptance.

Regardless of the method of appointment of public or outside members to board or committees responsible for accreditation, the most important problem is the *quality of the persons appointed.* To be effective these individuals must be intelligent, wise, possessed of good judgment, conscientious, responsible, and committed to the public interest.

The future effectiveness of accreditation conducted by the private sector of our society depends on its ability and willingness to serve and perform. Attention should

be given constantly to the identification of individuals of all backgrounds who possess these necessary qualities.

VIII

Conclusion

In this bicentennial year of the American Revolution it is appropriate to refer to an observation in *Goals for Americans* made by Morton Grodzins, professor of political science and director of the Federalism Workshop at the University of Chicago:

> Our structure of government is complex, and the politics operating that structure are mildly chaotic . . . Simply to understand the federal system is therefore a difficult task. Yet without understanding there is little possibility of producing desired changes in the system . . . Changes introduced into an imperfectly understood system are as likely to produce reverse consequences as the desired ones.[39]

The intent of this essay has been to add some further depth of perception of accreditation in order that changes in its structure will be made with understanding.

Accreditation is an integral part of our total governmental system which is based on the principles of separation of powers and balance of political forces. This federal system with its convoluted politics may seem mildly chaotic, but it has permitted and encouraged innovation and flexibility to an extent not known under most other forms of government. Consequently, every effort should be made to retain accreditation but to revise and adapt its structure and operations to changing conditions and needs so that its constructive force will continue to be a part of the balance of governmental powers.

William A. Kaplin wrote recently about these balances of forces with respect to accreditation; namely, the triad of the federal government, the several states, and the private accrediting agencies:

> All elements of the triad will continue to be involved in governance for the forseeable future. The capabilities, interests, and constituencies of each element are sufficiently different, and the traditions of federalism and private responsibility in postsecondary education are sufficiently strong, that substantial elimination of any element is unlikely both politically and as a matter of educational policy. Thus, changes in governance should proceed from a continuing recognition of all three elements.[40]

The inclusion of public or outside members on boards and committees responsible for accreditation provides one important means of broadening the understanding of these engaged in this quasi-governmental activity and does so with recognition of the several elements involved in this process of educational governance.

Notes and References

1. Certification is the process by which a nongovernmental agency or association grants recognition to an individual who has met certain predetermined qualifications specified by that agency or association.

   Licensure is the process by which an agency of government grants permission to persons meeting predetermined qualifications to engage in a given occupation and/or use a particular title or grants permission to institutions to perform specified functions.

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Papers In This Series

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In Preparation by Authors

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How the Triad Should Work (tentative title), by Richard Fulton, Executive Director and General Counsel of the Association of Independent Colleges and Schools. Mr. Fulton originally conceived and promoted the "triad of responsibility" concept in testimony before various Congressional Committees. He will attempt in his paper to outline the appropriate areas of responsibility for each element of the triad. (Available Fall 1976)

Academic Success and Life Success (tentative title), by Richard Ferguson and Philip Rever of the American College Testing Program. This will be a co-authored paper dealing with relationships between "the good student and the good life." Although this topic has been much studied, the authors promise to bring new discussion of interest to the accrediting community. (Available Winter 1976)

None of these Occasional Papers and the conclusions and recommendations they contain necessarily represent an official viewpoint of the Council on Postsecondary Accreditation. They are written to stimulate discussion; some are provocative, some may be controversial, others may be primarily historical. All are intended to add to the literature of accreditation which has been all too sparse. From such writings, future policy might be enhanced. In the spirit of scholarship, COPA is pleased to publish this series and make the papers available at cost (below total costs, actually) to all its constituents and other interested parties.